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ATTORNEYS FOR DEFENDANT,
RICHARD "VINCE" LAMB

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY - TRENTON**

<hr/>		Civil Action No. 09-CV-5354-AET-DEA
CHARLES NOVINS, ESQ. P.C. and	:	
CHARLES NOVINS, Personally,	:	
	:	
Plaintiffs,	:	MOTION TO SANCTION
v.	:	PLAINTIFFS FOR FAILING TO
	:	COMPLY WITH
	:	<i>Fed R. Civ. P. 26(g)</i>
Kevin A. Cannon, et al.	:	
	:	
Defendants	:	
	:	
	:	
	:	
	:	
	:	ORAL ARGUMENT REQUESTED
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To:

Charles Novins, Esq.
54 East Water Street
Toms River, New Jersey 08754

Joseph A. Manzo, Esq.
37 Rose Lane
Rockaway, New Jersey 07866

TAKE NOTICE that the undersigned counsel for Counterclaimant Richard Vince Lamb shall move before the Honorable Judge Douglas E. Arpert on Monday, August 16, 2010, at the United States Federal Court House in Trenton, New Jersey, for an order sanctioning plaintiff Charles Novins, Esq., P.C. and Charles Novins, personally for failing to comply with their disclosure requirement under Fed. R. Civ. P. 26(a).

Counsel shall rely upon the declaration of Dennis Duncan and the letter brief accompanying this Notice.

A form of proposed order is annexed hereto.

The undersigned requests oral argument.

Law Office of Dennis J. Duncan, LLC
Attorneys for Defendant,
Richard "Vince" Lamb

By: /s/ Dennis J. Duncan
Dennis J. Duncan

Dated: July 12, 2010